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*Attorneys for Defendant Cisco Systems, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

EON CORP. IP HOLDINGS, LLC,

Plaintiff,

vs.

SENSUS USA INC., et. al.,

Defendants.

Case No.: 3:12-CV-01011-JST

**DECLARATION OF ALISON M.  
HADDOCK IN SUPPORT OF CISCO  
SYSTEMS, INC.'S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL**

1 I, Alison M. Haddock, declare as follows:

2 1. I am an attorney at law, admitted *pro hac vice* to practice before this Court, and an  
3 associate at the law firm of Duane Morris LLP (“Duane Morris”), counsel of record for Defendant  
4 Cisco Systems, Inc. (“Cisco”) in the above-titled action. I make this declaration in support of  
5 Cisco’s Administrative Motion to File Documents Under Seal (the “Motion to Seal”).  
6

7 2. As to the following facts, I know them to be true of my own knowledge.

8 3. I have personally reviewed Civil Local Rule 7-11, Civil Local Rule 79-5, this  
9 Court’s Standing Order Governing Administrative Motions to File Materials Under Seal, and the  
10 instructions for e-filing under seal provided on the Court’s website at  
11 <http://cand.uscourts.gov/ecf/underseal>. Based on my understanding of these orders, rules, and  
12 instructions, Cisco has complied with them in filing the Motion to Seal.  
13

14 4. Exhibit A of the Declaration of L. Norwood Jameson in support of Defendants’  
15 Motion for Attorneys’ Fees and Sanctions (the “Motion for Fees”) is a spreadsheet with a detailed  
16 description of the work performed by Duane Morris attorneys and paralegals for the time period of  
17 August 1, 2013 to April 30, 2014.

18 5. In some instances, the descriptions in the spreadsheet have been revised from what  
19 appears on actual invoices to protect against the disclosure of attorney-client information, attorney  
20 work product, or other highly sensitive litigation strategies, but the spreadsheet still summarizes  
21 the nature of the work and the date of the work so the Court can evaluate the reasonableness of the  
22 work performed.  
23

24 6. The spreadsheet contains non-public, sensitive information about Cisco’s litigation  
25 tactics and strategies. Cisco stands to suffer great harm and would be placed in a vulnerable  
26 position should this information become public.

27 7. The “good cause” standard applies because the Motion for Fees is non-dispositive.  
28

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct and that this declaration was executed this 28th day of May, 2014, at Atlanta,  
3 Georgia.  
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5 /s/Alison M. Haddock  
6 Alison M. Haddock  
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